



**RCRA COMPLIANCE
EVALUATION INSPECTION**

**COINING TECHNOLOGIES INC.
Clifton, New Jersey**

NJD982727612

March 30, 2010

Participating Personnel:

U.S. Environmental Protection Agency
Robert Morrell, Geologist

Coining Technologies Inc.
Ray Reboli, Operations Manager
Robert Mastej, Manufacturing Manager
Walter Dubis, Maintenance Supervisor

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RCRA Compliance Evaluation Inspection

Objective

A RCRA Compliance Evaluation Inspection (CEI) was conducted at Coining Technologies Incorporated on March 30, 2010. The purpose of the inspection was to obtain information on the facility's hazardous waste management program. This information will be used to determine compliance with regulations pertaining to the Resource Conservation and Recovery Act (RCRA).

Survey Participants

Coining Technologies Inc.
Ray Reboli, Operations Manager
Robert Mastej, Manufacturing Manager
Walter Dubis, Maintenance Supervisor

U.S. Environmental Protection Agency
Robert Morrell, Geologist

Facility Description

Coining Technologies Incorporated is located at 400 Kuller Road in Clifton, New Jersey. The facility is a manufacturer of specialized metal components for the microelectronic industry. The 50,000 square-foot manufacturing facility operates 10 hours per day, four days per week.

Raw materials are delivered to the facility on coils. The raw materials consist of stainless steel or kolvar, which is an iron-nickel-cobalt alloy that exhibits low thermal expansion properties. The coil is transferred to one of 40 presses that have different tonnages and different dies. Approximately half of the presses have progressive dies and half of the presses have secondary dies. Progressive dies can perform several operations during the manufacturing of a part. Secondary dies can only perform one operation and the die is changed to perform the next step in the manufacturing process. Each press can be used for a variety of metal fabrication processes including forming, drawing, punching, screw machining, milling, stamping, and coining. Coining is a specialized metal stamping process where the metal is plastically forced to conform to a die. There are also six CNC (computer and numerically controlled) machining centers that are used for drilling, cutting, and other metal fabrication processes.

After the metal parts are fabricated, they are sent to one of three rotary tumblers for deburring. A liquid soap solution known as Roto Finish is added to the tumbler to aid in the deburring process. Then the parts are sent to the grinding area for further finishing. Some parts require cleaning with mineral spirits to remove cutting oils. The parts are placed in a basket and dipped in a 2.5-gallon can. After a final inspection, the parts are packed and shipped to the customer.

Water and Wastewater

Process water for the plant is supplied by the Town of Clifton. The water is used in the tumbling process. After tumbling, the wastewater drains into a sediment tank near the bottom of the tumbler. The wastewater from the three tumblers flows into a sump and is pumped to the double-stage sedimentation tanks. Oil is skimmed from the top of the first tank and placed in a 55-gallon drum. The solids, consisting of metal chips and filings, settle to the bottom of the tanks and are placed in a 55-gallon drum. The wastewater is discharged to the local POTW (Passaic Valley).

Solid and Hazardous Waste Management

Scrap metal is generated during the metal fabrication processes at the presses and the CNC machining centers. The scrap metal is placed in a 55-gallon drum. Solids from the tumbler sediment tanks and the double-stage sedimentation tanks are also placed in a 55-gallon drum. These drums are picked up by Ames Recycling, a metals recycling facility in Livingston, New Jersey.

Used cutting oil from the machines is placed in a 55-gallon drum and shipped as a non-hazardous waste to Waste Recovery Solutions in Myerstown, Pennsylvania. The facility generates approximately one 55-gallon drum of used cutting oil per year.

When the mineral spirits become spent, the 2.5 gallon can is carried to the hazardous waste storage area and the contents are placed in a 55-gallon drum. The oil that is skimmed from the sedimentation tank is also placed in the same drum as the used mineral spirits. This waste is shipped as a D001 hazardous waste (flammable liquids containing oil and mineral spirits) to Giant Resource Recovery in Sumter, South Carolina. The facility generates approximately one 55-gallon drum of D001 hazardous waste per month.

Fluorescent bulbs are placed in a bulb box and are managed as universal waste.

Findings

Coining Technologies Incorporated is a small quantity generator of hazardous waste. On the day of the inspection, there were four 55-gallon drums of hazardous waste being stored in the hazardous waste storage area. Two drums were full, one drum was

approximately 80 percent full, and one drum was approximately 60 percent full. The first full drum contained a flammable sticker and a hazardous waste label with no accumulation start date. The second full drum contained a flammable sticker and no hazardous waste label. The two partially full drums contained no labels. All containers of hazardous waste must be marked clearly with the words "Hazardous Waste", as specified in 40 CFR Section 262.34(a)(3). In addition, the accumulation start date must be marked on all containers when the period of accumulation begins, as specified in 40 CFR Section 262.34(a)(2).

The facility does not maintain a weekly inspection log of the hazardous waste storage area. The container storage area should be inspected weekly, as specified in 40 CFR Section 265.174.

The contingency plan does not contain current personnel information. The contingency plan should be updated to include current names and phone numbers of emergency coordinators, as specified in 40 CFR Section 262.34(d)(5).

Safety training is provided for all employees when employment begins. The maintenance supervisor, who handles all hazardous waste and prepares labels for the drums, has completed a hazardous materials training course.

Conclusions and Recommendations

Based on the above findings, Coining Technologies Incorporated is not in compliance with regulations pertaining to the Resource Conservation and Recovery Act. The following recommendations should be implemented to ensure compliance:

1. The containers in the hazardous waste storage area should be clearly marked with the words "Hazardous Waste", as specified in 40 CFR Section 262.34(a)(3).
2. The accumulation start date should be marked on all containers when the period of accumulation begins, as specified in 40 CFR Section 262.34(a)(2).
3. A weekly inspection log for the hazardous waste storage area should be initiated to comply with the requirements in 40 CFR Section 265.174.
4. The contingency plan should be updated to include current names and phone numbers of emergency coordinators, as specified in 40 CFR Section 262.34(d)(5).

Appropriate actions should be implemented immediately to rectify the above deficiencies.

Attachments

Photographs (#1 - #4)

PHOTO LOG

Photo #1: View of the hazardous waste storage area.



Photo #2: View the hazardous waste label with no accumulation start date.



Photo #3: View of the 2.5-gallon can of mineral spirits.

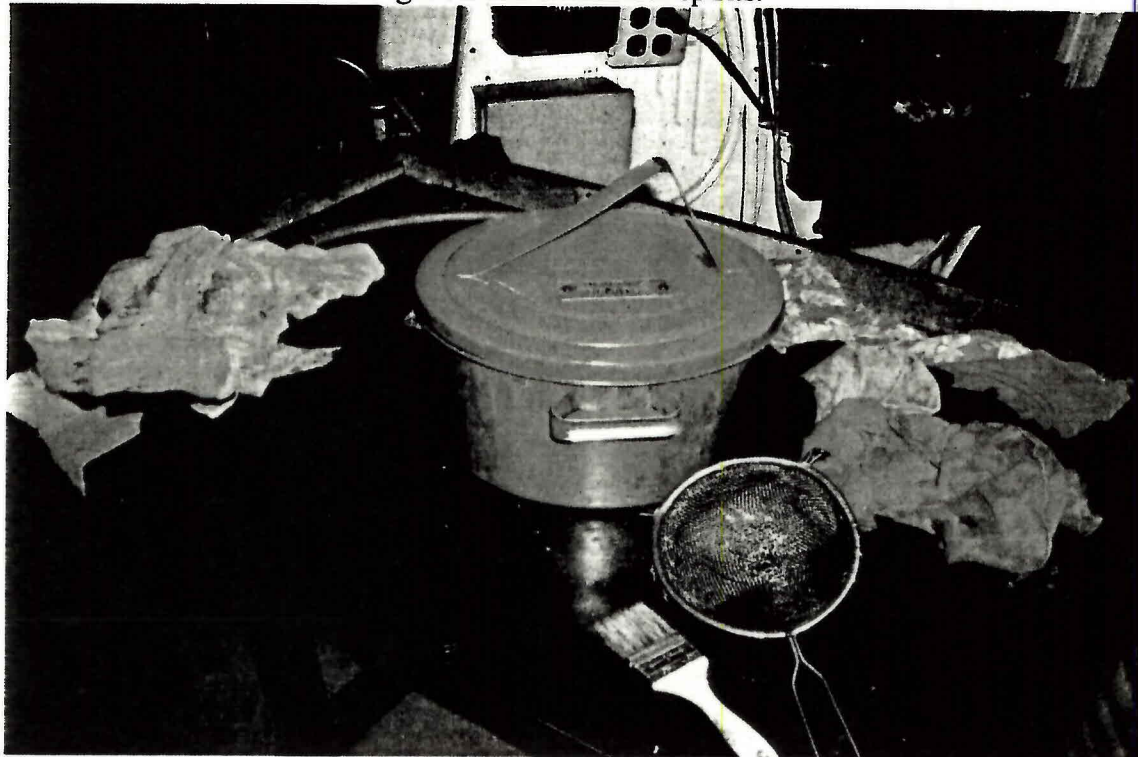


Photo #4: View of the double-stage sedimentation tanks.



